

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
22-CR-76 (KMM/TNL)

UNITED STATES OF AMERICA,)	SUPERSEDING
)	INDICTMENT
Plaintiff,)	
)	18 U.S.C. § 2
v.)	18 U.S.C. § 924(c)(1)(A)(ii)
)	18 U.S.C. § 924(o)
(1) SHEVIRIO KAVIRION CHILDS-YOUNG,)	18 U.S.C. § 1951
a/k/a "Rio,")	18 U.S.C. § 2119(1)
)	18 U.S.C. § 982(a)(5)
(2) WILLIAM CHARLES SAFFOLD,)	21 U.S.C. § 853(p)
)	28 U.S.C. § 2461(c)
(3) ERIC HARRELL KNIGHT, and)	
)	
(4) JAVEYON DEMARIO TATE,)	
)	
Defendants.)	

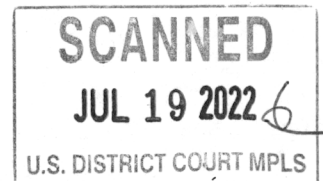
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Use, Carry, and Brandish Firearms
During and in Relation to a Crime of Violence)

From at least in or about September of 2021, and through at least in or
about October of 2021, in the State and District of Minnesota, the defendants,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"
WILLIAM CHARLES SAFFOLD,
ERIC HARRELL KNIGHT, and
JAVEYON DEMARIO TATE,



knowingly and intentionally conspired with each other, and with others known
and unknown to the grand jury, to knowingly and unlawfully use, carry, and

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brandish firearms during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, that is, aiding and abetting carjacking, as alleged in Counts 2, 4, 7, 10, 13, and 24 of this Superseding Indictment; and aiding and abetting interference with commerce by robbery, as alleged in Counts 5, 8, 11, 14, 16, 18, 20, 22, 25, and 27 of this Superseding Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

BACKGROUND AND PURPOSE OF CONSPIRACY

1. During the timeframe of the conspiracy, the defendants and others agreed to engage in a series of violent carjackings and robberies, focusing on Uber and Lyft drivers. The victim-driver would be lured to a particular location to pick-up or drop-off a passenger. When the victim-driver arrived, members of the conspiracy would brandish firearms and demand the cell phone and wallet of the victim-driver. Members of the conspiracy would typically force the victim-driver at gunpoint to unlock his or her cell phone, and to provide passcodes that would and did allow members of the conspiracy to transfer money by phone applications (such as Cash App) from the victim-driver's account to the accounts of members of the conspiracy.

2. Members of the conspiracy would typically strike or pistol-whip the victim-driver, either to intimidate the victim-driver, or to force faster compliance with demands. Members of the conspiracy would also threaten to

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kill the victim-driver if he or she did not comply.

3. Members of the conspiracy would typically carjack the victim-driver, taking his or her car at gunpoint.

OVERT ACTS

4. During and in furtherance of the conspiracy, the defendants committed multiple overt acts, including the offenses listed in Counts 2 through 29 of this Superseding Indictment, which are incorporated here by reference.

All in violation of Title 18, United States Code, Section 924(o).

COUNT 2

(Aiding and Abetting Carjacking)

On or about September 13, 2021, in the State and District of Minnesota, the defendants,

**WILLIAM CHARLES SAFFOLD and
ERIC HARRELL KNIGHT,**

aiding and abetting, and being aided and abetted by, each other and others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a gold 2013 Toyota Avalon bearing Minnesota license plate DLN257 and vehicle identification number 4T1BK1EB2DU069785, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of A.A. by force and violence and by

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intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 3

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 13, 2021, in the State and District of Minnesota, the defendants,

**WILLIAM CHARLES SAFFOLD and
ERIC HARRELL KNIGHT,**

did knowingly brandish, carry, and use a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, carjacking, as alleged in Count 2 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 4

(Aiding and Abetting Carjacking)

On or about September 21, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a black 2016 Chevrolet Suburban bearing Minnesota license plate

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GZN747 and vehicle identification number 1GNSKGKC9GR273230, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of L.D.W. by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 5

(Aiding and Abetting Interference with Commerce by Robbery)

On or about September 21, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a black 2016 Chevrolet Suburban bearing Minnesota license plate GZN747 and vehicle identification number 1GNSKGKC9GR273230, the personal property of L.D.W., who was then acting as a driver for the Uber rideshare company, a commercial business then engaged in interstate commerce, from the person

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and in the presence of L.D.W., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to L.D.W.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 6

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 21, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

did knowingly brandish, carry, and use a firearm during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, that is, carjacking and interference with commerce by robbery, as alleged in Counts and 4 and 5 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 7

(Aiding and Abetting Carjacking)

On or about September 26, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and

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unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a red 2014 Ford Explorer bearing Minnesota license plate GFH289 and vehicle identification number 1FM5K8D84EGB73318, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of A.O.A. by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 8

(Aiding and Abetting Interference with Commerce by Robbery)

On or about September 26, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a red 2014 Ford Explorer bearing Minnesota license plate GFH289 and vehicle identification number 1FM5K8D84EGB73318, the personal property of

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A.O.A., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of A.O.A., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to A.O.A.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 9

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 26, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

did knowingly brandish, carry, and use a firearm during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, that is, carjacking and interference with commerce by robbery, as alleged in Counts 7 and 8 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 10

(Aiding and Abetting Carjacking)

On or about September 30, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

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aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a black 2016 Honda Accord Crosstour bearing Minnesota license plate 715TVB and vehicle identification number 1HGCR2F84GA031737, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of B.A.B. by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 11

(Aiding and Abetting Interference with Commerce by Robbery)

On or about September 30, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a black 2016 Honda Accord Crosstour bearing license plate 715TVB and vehicle

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identification number 1HGCR2F84GA031737, the personal property of B.A.B., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of B.A.B., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to B.A.B.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 12

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about September 30, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

did knowingly brandish, carry, and use a firearm during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, that is, carjacking and interference with commerce by robbery, as alleged in Counts 10 and 11 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

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COUNT 13
(Aiding and Abetting Carjacking)

On or about October 4, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a black 2016 Toyota Camry bearing Minnesota license plate DHF480 and vehicle identification number 4T1BF1FK6HU711224, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of I.E. by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 14
(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 4, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect

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commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a black 2016 Toyota Camry bearing Minnesota license plate DHF480 and vehicle identification number 4T1BF1FK6HU711224, the personal property of I.E., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of I.E., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to I.E.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 15

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 4, 2021, in the State and District of Minnesota, the defendant,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio,"

did knowingly brandish, carry, and use a firearm during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, that is, carjacking and interference with commerce by robbery, as alleged in Counts 13 and 14 of this Superseding Indictment; all in violation of

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Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 16

(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 14, 2021, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a Motorola G5 cellular telephone and a Coolpad cellular telephone, the personal property of A.H.A., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of A.H.A., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to A.H.A.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

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COUNT 17

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 14, 2021, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

did knowingly brandish, carry, and use a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as alleged in Count 16 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 18

(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 17, 2021, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a

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Samsung cellular telephone, the personal property of Y.D., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of Y.D., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to Y.D.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 19

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 17, 2021, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

did knowingly brandish, carry, and use a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as alleged in Count 18 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

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COUNT 20

(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 19, 2021, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a Samsung cellular telephone, the personal property of G.A.T., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of G.A.T., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to G.A.T.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

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COUNT 21

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 19, 2021, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

did knowingly brandish, carry, and use a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as alleged in Count 20 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 22

(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 21, 2021, in the State and District of Minnesota, the defendant,

ERIC HARRELL KNIGHT,

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of an

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Apple iPhone 12 Pro Max, the personal property of I.S., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of I.S., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to I.S.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 23

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 21, 2021, in the State and District of Minnesota, the defendant,

ERIC HARRELL KNIGHT,

did knowingly brandish, carry, and use a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as alleged in Count 22 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

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COUNT 24
(Aiding and Abetting Carjacking)

On or about October 21, 2021, in the State and District of Minnesota, the defendant,

WILLIAM CHARLES SAFFOLD,

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did knowingly and unlawfully take a motor vehicle, that is, a black 2020 Jeep Grand Cherokee bearing Minnesota license plate FCY214 and vehicle identification number 1C4RJFBG2LC375974, that had been transported, shipped, and received in interstate and foreign commerce, from the person and presence of M.A.S. by force and violence and by intimidation, with the intent to cause serious bodily harm, all in violation of Title 18, United States Code, Sections 2 and 2119(1).

COUNT 25
(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 21, 2021, in the State and District of Minnesota, the defendant,

WILLIAM CHARLES SAFFOLD,

aiding and abetting, and being aided and abetted by, others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951,

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and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain personal property consisting of a 2020 black Jeep Grand Cherokee bearing Minnesota license plate FCY214 and vehicle identification number 1C4RJFBG2LC375974, the personal property of M.A.S., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of M.A.S., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to M.A.S.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 26

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 21, 2021, in the State and District of Minnesota, the defendant,

WILLIAM CHARLES SAFFOLD,

did knowingly brandish, carry, and use a firearm during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, that is, carjacking and interference with commerce by robbery, as alleged in Counts 24 and 25 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

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COUNT 27

(Aiding and Abetting Interference with Commerce by Robbery)

On or about October 23, 2021, in the State and District of Minnesota, the defendants,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio," and
WILLIAM CHARLES SAFFOLD,

aiding and abetting, and being aided and abetted by, each other and others known and unknown to the grand jury, did unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as defined by Title 18, United States Code, Section 1951(b)(1), in that the defendants did unlawfully take and obtain personal property consisting of an Apple iPhone, the personal property of F.H.A., who was then acting as a driver for the Lyft rideshare company, a commercial business then engaged in interstate commerce, from the person and in the presence of F.H.A., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to F.H.A.'s person, all in violation of Title 18, United States Code, Sections 2 and 1951.

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COUNT 28

(Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about October 23, 2021, in the State and District of Minnesota, the defendants,

SHEVIRIO KAVIRION CHILDS-YOUNG,
a/k/a "Rio," and
WILLIAM CHARLES SAFFOLD,

did knowingly brandish, carry, and use a firearm during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, that is, interference with commerce by robbery, as alleged in Count 27 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 29

(Unlawful Possession of a Machinegun)

On or about January 14, 2022, in the State and District of Minnesota, the defendant,

JAVEYON DEMARIO TATE,

did knowingly possess a machinegun, namely, a Glock model 21 .45 caliber semiautomatic pistol bearing serial number WTK741, equipped with an attached conversion device, commonly known as a "switch" or "auto sear," enabling it to be fired as a fully automatic weapon by a single function of the trigger, knowing it had characteristics that made it a machinegun as defined

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by Title 26, United States Code, Section 5845(b), all in violation of Title 18, United States Code, Sections 922(o)(1) and 924(a)(2).

COUNT 30

(Assault of a Federal Law Enforcement Officer)

On or about May 11, 2022, in the State and District of Minnesota, the defendant,

WILLIAM CHARLES SAFFOLD,

did knowingly, intentionally and forcibly assault, resist, oppose, impede, intimidate, and interfere with Special Agent C.M.F., an employee of the Federal Bureau of Investigation, while Special Agent C.M.F. was engaged in the performance of his official duties, and in doing so, used a deadly and dangerous weapon, to wit, a Polymer 80 9mm semiautomatic pistol, all in violation of Title 18, United States Code, Sections 111(a)(1) and 111(b).

FORFEITURE ALLEGATIONS

Counts 1 through 30 of this Superseding Indictment are hereby realleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(5), and Title 18, United States Code, Sections 981(a)(1)(C) and 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

If convicted of any of Counts 1 through 30 of the Superseding Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United

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States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms, accessories (including any magazines), and ammunition, involved in, connected with, or used in any knowing violation of, the offenses alleged, including, but not limited to, a Polymer80 model PMF 9mm semiautomatic pistol bearing serial number CA25976, together with ammunition.

If convicted of any of Counts 2, 4, 7, 10, 13, or 24 of the Superseding Indictment, the defendants shall forfeit to the United States, pursuant to Title 18 United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, to violations of Title 18, United States Code, Section 2119.

If convicted of any of Counts 5, 8, 11, 14, 18, 20, 22, 25, and 27 of the Superseding Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1951.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as

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incorporated by Title 28, United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections 2, 922(g)(1), 922(g)(3), 924(a)(2), 924(c)(1)(A)(ii), 924(d)(1), 924(o), 982(a)(5), and 2119(1), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON